



**OFFICE OF  
INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

## Hotline Complaint Form

Anyone with knowledge of fraud, waste, abuse, misconduct, or mismanagement involving the U.S. Department of the Interior should call or write the Office of Inspector General's Hotline (please choose the method of contact which best suits you):

- Telephone - OIG Hotline's Toll Free Number: 1-800-424-5081
- Fax - Complete and submit the Complaint Form to:  
703-487-5402 (Attention: Hotline Operations)
- US Mail - Complete and submit the Complaint Form to:  
Office of Inspector General  
Department of the Interior  
381 Elen Street, Suite 3000  
Attention: Intake Management Unit  
Herndon, VA 20170
- E-mail - Complete and submit the Complaint Form by pressing the submit button below:

You may also report fraudulent activities to the nearest regional OIG offices at the following locations:

- Eastern Regional Office, Herndon, Virginia (703) 487-8051
- Central Regional Office, Lakewood, Colorado (303) 236-8296
- Western Regional Office, Sacramento, California (916) 978-5630

## Alleged Misconduct

Who committed the alleged misconduct/wrongdoing? (What is the title/position held by the alleged wrongdoer? Please include names, addresses and telephone numbers of victims and witnesses. If providing information concerning contractor or grantee fraud, please provide the name of the primary contractor or sub, type of contract, contract or grant numbers, the date of the award and name of agency official.)

What exactly did the individual(s) do that was wrong? (Please provide specific and relevant details concerning the alleged misconduct/wrongdoing.)

BLM field offices update their resource management plans (RMP) every 20 to 25 years. The Carlsbad Field Office (CFO) is in the process of updating their plan and this effort began approximately in 2010. Updating of the resource management plan must follow the Federal Land Policy and Management Act (FLPMA). Section 202 (c) of FLPMA outlines how land use plans shall be developed. Up until the change of Administration in January 2017, the CFO followed FLPMA Section 202 (c) and made land use decisions after years of work with the public along with interdisciplinary team (ID team) review and analysis. These decisions were near ready for public review in September 2016 and awaiting the BLM Washington Office's "green light" to publish the Draft Resource Management Plan document and the CFO had arrived at the last step before publishing the decisions made after years of review and analysis. Only addressing outstanding and specific questions by the BLM Washington Office staff remained. The election in November 2016 brought in a new administration and this led to a change of RMP land management decisions and this change in decisions did not follow the requirements of FLPMA, in particular Section 202(c)(2) and Section 202(c)(3). Moreover, it is my belief that the rationale for making these changes in land management decisions were not documented, making these changes arbitrary and capricious. It is my understanding that these changes to land management decisions were directed by top appointees at the BLM and the Department of Interior. To be clear, amount and magnitude of the land management decision changes post-administration change would not have occurred in the CFO, by the ID Team, had the CFO not been instructed to make these changes by new administration officials, since these decisions had already been mostly finalized after six years of planning that followed FLPMA. The CFO interdisciplinary team was not considering changes of this magnitude after September 2016 and before the new administration came into power at the BLM. It is my opinion that changes in land management decisions of this magnitude manifested in two steps: 1. Top BLM and DOI officials directed the CFO to change the land management decisions (land use allocations and lease stipulations) that favor the private sector, namely the oil and gas industry, in 2017. 2. The CFO Interdisciplinary team selected the geographical locations where restrictions (land use allocations and lease stipulations) were loosened. The first step is not prescribed in FLPMA. Moreover, the first step bypasses the decision making process prescribed in Section 202 (c) (2). Had Step No. 1 not occurred, the CFO would not have had justification to proceed to Step No. 2. Other changed decisions include removing more restrictive and protective allocations and lease stipulations from proposed Areas of Critical Environmental Concern (ACEC). Section 202 (c)(3)FLPMA states, "give priority to the designation and protection of areas of critical environmental concern;" Even prior to the administration change, the CFO had elected to not prioritize ACECs that "qualified" and carry them forward, with a defined boundary of the area, in the "Preferred Alternative" identified in the RMP. But in not carrying forward the ACECs in the Preferred Alternative, the CFO had applied protective and more restrictive allocations and oil and gas lease stipulations to these areas.

When did the misconduct/wrongdoing occur? (Please provide dates and times, if possible.)

After the new administration officials came into office. 2017 to present.

Where did the misconduct/wrongdoing occur? (Please provide the bureau or office, city and state.)

Washington D.C. office as they directed the CFO to make RMP decision changes.

How was the misconduct/wrongdoing committed? (i.e. falsifying documents, etc.)

It is my belief this was verbally directed since having a paper trail directing the CFO to make RMP decision changes would leave evidence of FLPMA violations. However, an investigation into email correspondence of top BLM and DOI officials may glean written evidence.

you have first hand knowledge of the misconduct/wrongdoing?

Yes, in part.

Where can we obtain additional information concerning this misconduct/wrongdoing? (i.e. documents, etc.)